

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,)
Plaintiff)
V.)
VANDERLEI RODRIGUES DEARAUJO)
a/k/a "Neneco",)
Defendant)
)

Criminal No. 1:19-cr-10210-NMG

DEFENDANT VANDERLEI DEARAUJO'S MOTION IN LIMINE
TO ADMIT PHONE RECORDS BETWEEN THE DEFENDANT AND THE
GOVERNMENT'S CONFIDENTIAL INFORMANT

Defendant Vanderlei DeAraujo hereby moves in limine for an order allowing the admission of his phone records. Mr. DeAraujo is specifically seeking the admission of phone records, including calls between himself and the government's confidential information. These records were previously obtained by the government, and are certified.

Defense counsel is also in on-going communication with Assistant United States Attorney Lindsey Weinstein, regarding potential stipulations and an agreement for portions of the phone records being admitted at trial. Mr. DeAraujo is reserving the right to supplement this motion, after continued conversations concerning potential stipulations.

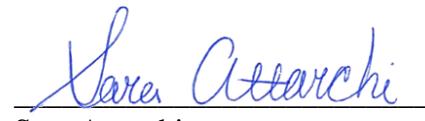
Respectfully Submitted
For the Defendant,
VANDERLEI DEARAUJO,

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Dated: March 9, 2020

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on March 9, 2020.



Sara Attarchi